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John J. Pringle, Jr.
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July 17, 2006

VIA ELECTRONIC MAIL SERVICE AND HAND-DELIVERY



M. John Bowen, Esquire
Margaret Fox, Esquire
McNair Law Firm, PA
1301 Gervais Street, 11th Floor
Columbia SC 29201

RE: Petition of Charter Fiberlink SC – CCO, LLC for Arbitration with Piedmont Rural Telephone Cooperative, Inc., **Docket No. 2006-142-C**
ELS File No. 797-11361

Dear Mr. Bowen and Ms. Fox:

Enclosed is Charter Fiberlink SC – CCO, LLC's First Set of Interrogatories and First Request for Production of Documents to Piedmont Rural Telephone Cooperative, Inc. in the above-referenced docket.

Very truly yours,


John J. Pringle, Jr.
by 

Enclosures

cc: C. Lessie Hammonds, Esquire, Shannon Bower Hudson, Esquire
Charles A. Hudak, Esquire/Charles Gerkin, Esquire
Joseph Melchers, Esquire
The Honorable Charles L. A. Terreni

THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

In Re:)	
)	
Petition of Charter Fiberlink SC – CCO,)	
LLC for Arbitration of Certain Terms and)	
Conditions of Proposed Agreement with)	
Piedmont Rural Telephone Cooperative, Inc.)	Docket No. 2006-142-C
Concerning Interconnection under the)	
Communications Act of 1934, as amended)	
by the Telecommunications Act of 1996)	

**CHARTER FIBERLINK SC – CCO, LLC’S FIRST SET OF INTERROGATORIES
TO PIEDMONT RURAL TELEPHONE COOPERATIVE, INC.**

Charter Fiberlink SC – CCO, LLC (“Charter Fiberlink”), by and through its undersigned attorneys, and pursuant to S.C. Code Ann. Regs. 103-851 and Rule 33 of the South Carolina Rules of Civil Procedure, propounds the following interrogatories to Piedmont Rural Telephone Cooperative, Inc. (“Piedmont”). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served within ten (10) days of service of these interrogatories. Each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address and relationship to Piedmont of those persons providing the answers to each of the following interrogatories.

Definitions

1. The acronym “CLEC” refers to competitive local exchange carriers.
2. The acronym “CMRS” refers to commercial mobile radio service.
3. The acronym “ILEC” refers to an incumbent local exchange carrier as defined in 47 U.S.C. § 251(h).

4. The acronym "LERG" refers to the Local Exchange Routing Guide published by Telcordia Technologies, Inc.

5. The term "local dialing pattern" refers to dialing a telephone call using the same number of digits that are used for calls to telephone numbers within the originating rate center.

6. The term "Piedmont" means Piedmont Rural Telephone Cooperative, Inc.

7. The term "communication" includes, without limitation of its generality, correspondence, email, statements, agreements, contracts, reports, white papers, users' guides, job aids, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as intercoms, telephones, television, radio, electronic mail or the Internet.

8. The term "document," as used herein, shall include, without limitation, all written, reported, recorded, magnetic, graphic, or photographic matter, however produced or reproduced, which is now, or was at any time, in the possession, custody, or control of your company and its affiliates including, but not limited to, all reports, memoranda, notes (including reports, memoranda, notes of telephone, email or oral conversations and conferences), financial reports, data records, letters, envelopes, telegrams, messages, electronic mail (e-mail), studies, analyses, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, accounts, pamphlets, pictures, films, maps, work papers, arithmetical computations, minutes of all communications of any type (including inter- and intra-office communications), purchase orders, invoices, statements of account, questionnaires, surveys, graphs, recordings, video or audio tapes, punch cards, magnetic tapes, discs, data cells, drums, printouts, records of any sort of meeting, invoices, diaries, and other

data compilations from which information can be obtained, including drafts of the foregoing items and copies or reproductions of the foregoing upon which notations and writings have been made which do not appear on the originals.

9. The term “identify” or “identifying” means:
 - a. When used in reference to **natural persons**: (1) full name; (2) last known address and telephone number; (3) whether the person is currently employed by, associated or affiliated with Piedmont; (4) that person’s current or former position; and (5) dates of employment, association or affiliation.
 - b. When used in reference to a **document**: (1) its author; (2) actual and intended recipient(s); (3) date of creation; and (4) brief description of its contents.
 - c. When used in reference to a **communication**: (1) whether the communication was oral or written; (2) the identity of the communicator; (3) the person receiving the communication; and (4) the location of the communicator and the person receiving the information, if the communication was oral.
 - d. When used in reference to a **trunk group**: (1) the end points of the trunk group, including the CLLI code and English language identifier for each such end point; (2) the V and H coordinates of each such end point; (3) the total capacity of the trunk group; (4) the airline distance between the end points of the trunk group; (5) whether the trunk group is a one-way or two-way trunk group; and (6) if the trunk group is a one-way trunk group, the directionality of such trunk group.

10. The terms "you," "your," "yours," or "your company" means Piedmont Rural Telephone Cooperative, Inc. and its officers, agents, attorneys, employees, representatives, agents, and consultants.

Interrogatories

Interrogatory No. 1: Please refer to the document attached hereto as Exhibit A. Please summarize the terms and conditions (including, without limitation, rates and charges, if any) of the unexecuted agreement referred to in Exhibit A.

Interrogatory No. 2: Please state whether, as of the date of your response to these Interrogatories, you have executed the agreement referred to in Exhibit A.

Interrogatory No. 3: Please identify each and every trunk group directly connecting one of your end office switches to another end office or tandem switch owned or operated by you.

Interrogatory No. 4: Please identify each and every trunk group directly connecting one of your end office switches to an end office switch owned or operated by another telecommunications carrier.

Interrogatory No. 5: Please identify each and every trunk group directly connecting one of your end office switches to a tandem switch owned or operated by another telecommunications carrier.

Interrogatory No. 6: Please identify each and every trunk group directly connecting your tandem switch, if any, to a tandem switch owned or operated by another telecommunications carrier.

Interrogatory No. 7: For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, please state whether, as of the date of your responses to these Interrogatories, one or more of your end office switches originates any calls dialed with a local dialing pattern

over such trunk group that are sent directly or indirectly to NPA-NXX codes assigned to one or more rate centers to which your retail tariff provides for toll-free calling with a local dialing pattern.

Interrogatory No. 8: For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, please state whether, as of the date of your responses to these Interrogatories, one or more of your end office switches receives any calls dialed with a local dialing pattern over such trunk group that are originated from NPA-NXX codes assigned to one or more rate centers from which the retail tariff of the ILEC providing local exchange service in such rate center provides for toll-free calling with a local dialing pattern to one or more rate centers within which you provide local exchange service as an ILEC.

Interrogatory No. 9: For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, please state whether it is technically feasible for one or more of your end office switches to originate calls dialed with a local dialing pattern over such trunk group that are sent directly or indirectly to NPA-NXX codes assigned to Charter Fiberlink that are associated in the LERG with one or more rate centers to which your retail tariff provides for toll-free calling with a local dialing pattern and, if so, identify the Charter Fiberlink NPA-NXX code(s) and the rate center(s) for which such call origination is technically feasible.

Interrogatory No. 10: For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6 with respect to which you contend that it is not technically feasible for you to originate calls dialed with a local dialing pattern over such trunk group that are sent directly or indirectly to one or more NPA-NXX codes assigned to Charter Fiberlink that are associated in the LERG with one or more rate centers to which your retail tariff provides for toll-free calling with a local dialing pattern, please identify the Charter Fiberlink NPA-NXX

code(s) and the rate center(s) for which you contend such call origination is not technically feasible and state in detail why such call origination is not technically feasible.

Interrogatory No. 11: For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, please state whether it is technically feasible for you to receive calls dialed with a local dialing pattern over such trunk group that are originated from NPA-NXX codes assigned to Charter Fiberlink that are associated in the LERG with one or more rate centers from which the retail tariff of the ILEC providing local exchange service in such rate center provides for toll-free calling with a local dialing pattern to one or more rate centers within which you provide local exchange service as an ILEC and, if so, identify the Charter Fiberlink NPA-NXX code(s) and the rate center(s) for which your receipt of such calls is technically feasible.

Interrogatory No. 12: For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6 with respect to which you contend that it is not technically feasible for you to receive calls dialed with a local dialing pattern over such trunk group that are originated from NPA-NXX codes assigned to Charter Fiberlink that are associated in the LERG with one or more rate centers from which the retail tariff of the ILEC providing local exchange service in such rate center provides for toll-free calling with a local dialing pattern to one or more rate centers within which you provide local exchange service as an ILEC, please identify the Charter Fiberlink NPA-NXX code(s) and the rate center(s) for which you contend that your receipt of such calls is not technically feasible and state in detail why your receipt of such calls is not technically feasible.

Interrogatory No. 13: For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, describe the nature and jurisdiction of the telecommunications traffic that is

originated and terminated over such trunk group as of the date of your response to these Interrogatories.

Interrogatory No. 14: For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, please identify each and every statute, regulation, contract, tariff or agreement that you contend restricts the nature or jurisdiction of the telecommunications traffic that may be originated or terminated over such trunk group and the nature of the restriction imposed by such statute, regulation, contract, tariff or agreement.

Interrogatory No. 15: Please summarize the terms and conditions (including, without limitation, rates and charges, if any) of each and every contract or agreement identified in your response to Interrogatory No. 14 that does not exist in written form.

Interrogatory No. 16: Please identify each and every currently effective contract or agreement of any kind or nature between Piedmont Rural Telephone Cooperative, Inc. and PRTCommunications, LLC.

Interrogatory No. 17: Please summarize the terms and conditions (including, without limitation, rates and charges, if any) of each and every agreement identified in your response to Interrogatory No. 17 that does not exist in written form.

s/ John J. Pringle, Jr.
John J. Pringle, Jr., Esq.

ELLIS, LAWHORNE & SIMS, P.A.
P.O. Box 2285
Columbia, SC 29202
(803) 779-0066

Charles A. Hudak, Esq.
Norman B. Gerry, Esq.
Charles V. Gerkin, Jr., Esq.

FRIEND, HUDAK & HARRIS, LLP
Three Ravinia Drive, Suite 1450
Atlanta, Georgia 30346-2131
(770) 399-9500

ATTORNEYS FOR CHARTER FIBERLINK SC –
CCO, LLC

July 17, 2006

Exhibit A

Exhibit A to
Charter Fiberlink's First Set of
Interrogatories to Piedmont Rural
Telephone Cooperative, Inc.

MARGARET M. FOX
pfox@mcnair.net

BANK OF AMERICA TOWER
1301 GERVAIS STREET
COLUMBIA, SOUTH CAROLINA 29201

MCNAIR LAW FIRM, P.A.
ATTORNEYS AND COUNSELORS AT LAW
www.mcnair.net

POST OFFICE BOX 11390
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE (803) 799-9800
FACSIMILE (803) 753-3219

June 14, 2006

Mr. Charles L. A. Terreni
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: **BellSouth Telecommunications, Inc. Transit Traffic Tariff 2005-50**
Docket No. 2005-63-C

Dear Mr. Terreni:

By Order No. 2006-272, dated April 28, 2006, in the above-referenced docket, the Public Service Commission of South Carolina ("Commission") instructed BellSouth Telecommunications, Inc. ("BellSouth") and the South Carolina Telephone Coalition ("SCTC") to report on their progress in finalizing agreements regarding transit traffic. On May 30, 2006, Patrick Turner of BellSouth reported that BellSouth and SCTC's member companies had finalized the terms and conditions of agreements and that the parties anticipated completing the execution process within two weeks.

I am writing to inform the Commission that, while the execution process is in progress, it has not yet been completed. The final agreements have been prepared and distributed to the individual SCTC member companies. We expect to complete the execution process in the very near future.

SCTC and BellSouth will inform the Commission when that process is complete so that the Commission may take appropriate steps to close out this docket.

Very truly yours,

Margaret M. Fox
Margaret M. Fox

MMF/rwm

cc: Parties of Record

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
Docket No. 2005-63-C

IN RE: BellSouth Telecommunications, Inc.)
 Transit Traffic Tariff)
_____)

**CERTIFICATE
OF SERVICE**

This is to certify that I, Rebecca W. Martin, an employee with the McNair Law Firm, P. A., have this date served one (1) copy of the attached letter to the South Carolina Public Service Commission on behalf of the South Carolina Telephone Coalition in the above-referenced matter to the persons named below by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

Patrick W. Turner, Esquire
BellSouth Telecommunications, Inc.
Post Office Box 752
Columbia, South Carolina 29202

Meredith E. Mays, Esquire
BellSouth Telecommunications, Inc.
675 West Peachtree Street, N. E.
Atlanta, Georgia 30375

Benjamin Mustian, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211

Bonnie D. Shealy, Esquire
Robinson McFadden
Post Office Box 944
Columbia, South Carolina 29202

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P. A.
Post Office Box 2285
Columbia, South Carolina 29202

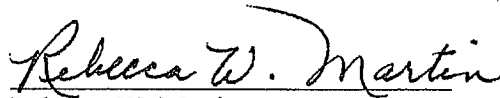
Gene V. Coker, Esquire
AT&T – Law and Governmental Affairs
1230 Peachtree Street, 4th Floor, Suite 4000
Atlanta, Georgia 30309

Robert D. Coble, Esquire
Nexsen, Pruet Adams Kleemeier, LLC
Post Office Drawer 2426
Columbia, South Carolina 29202-2426

Scott Elliott, Esquire
Elliott & Elliott
721 Olive Street
Columbia, South Carolina 29205

William R. L. Atkinson, Esquire
United Telephone & Sprint Communications
3065 Cumberland Circle, Mailstop GAATLD0602-612
Atlanta, Georgia 30339

M. Zel Gilbert
Director of External Affairs – South Carolina
Sprint
1122 Lady Street, Suite 1050
Columbia, South Carolina 29201


Rebecca W. Martin
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

June 14, 2006

Columbia, SC

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

In Re:)
)
Petition of Charter Fiberlink SC – CCO,)
LLC for Arbitration of Certain Terms and)
Conditions of Proposed Agreement with)
Piedmont Rural Telephone Cooperative, Inc.)
Concerning Interconnection under the)
Communications Act of 1934, as amended)
by the Telecommunications Act of 1996)

Docket No. 2006-142-C

**CHARTER FIBERLINK SC – CCO, LLC’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO PIEDMONT RURAL TELEPHONE COOPERATIVE, INC.**

Charter Fiberlink SC – CCO, LLC (“Charter Fiberlink”), by and through its undersigned attorneys, and pursuant to S.C. Code Regs. 103-854 and Rule 34 of the South Carolina Rules of Civil Procedure, hereby serves the following Request for Production of Documents upon Piedmont Rural Telephone Cooperative, Inc. (“Piedmont”).

Please produce the following documents at the offices of Ellis, Lawhorne & Sims, P.A., 1501 Main Street, 5th Floor, Columbia SC 29201 no later than 30 days after service of this request for the purpose of inspection and copying.

Definitions

1. The term “document,” as used herein, shall include, without limitation, all written, reported, recorded, magnetic, graphic, or photographic matter, however produced or reproduced, which is now, or was at any time, in the possession, custody, or control of your company and its affiliates including, but not limited to, all reports, memoranda, notes (including reports, memoranda, notes of telephone, email or oral conversations and conferences), financial reports, data records, letters, envelopes, telegrams, messages, electronic mail (e-mail), studies, analyses, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, accounts, pamphlets,

pictures, films, maps, work papers, arithmetical computations, minutes of all communications of any type (including inter- and intra-office communications), purchase orders, invoices, statements of account, questionnaires, surveys, graphs, recordings, video or audio tapes, punch cards, magnetic tapes, discs, data cells, drums, printouts, records of any sort of meeting, invoices, diaries, and other data compilations from which information can be obtained, including drafts of the foregoing items and copies or reproductions of the foregoing upon which notations and writings have been made which do not appear on the originals.

Documents Requested

Request No. 1: Please provide all documents evidencing or memorializing any agreement between Piedmont and BellSouth Telecommunications, Inc. ("BellSouth") concerning or relating to the transiting by BellSouth of local or intraLATA telecommunications traffic originated by Piedmont for delivery by BellSouth to other telecommunications carriers.

Request No. 2: Please refer to Exhibit A hereto. If you have not done so in your response to Request No. 1, please provide the agreement referred to in Exhibit A that was distributed to Piedmont for execution, whether or not such agreement has been executed by Piedmont.

Request No. 3: Please provide each and every contract or agreement identified in your response to Interrogatory No. 14 that exists in written form.

Request No. 4: Please provide each and every agreement of any kind or nature between Piedmont Rural Telephone Cooperative, Inc. and PRT Communications, LLC that exists in written form.

Request No. 5: To the extent not provided in your response to Request No. 4, please provide each and every agreement identified in your response to Interrogatory No. 16 that exists in written form.

s/ John J. Pringle, Jr.
John J. Pringle, Jr., Esq.

ELLIS, LAWHORNE & SIMS, P.A.
P.O. Box 2285
Columbia, SC 29202
(803) 779-0066

Charles A. Hudak, Esq.
Norman B. Gerry, Esq.
Charles V. Gerkin, Jr., Esq.

FRIEND, HUDAK & HARRIS, LLP
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ATTORNEYS FOR CHARTER FIBERLINK SC –
CCO, LLC

July 17, 2006

Exhibit A

Exhibit A to
Charter Fiberlink's First Request for
Production of Documents

MCNAIR LAW FIRM, P.A.
ATTORNEYS AND COUNSELORS AT LAW
www.mcnair.net

MARGARET M. FOX
pfox@mcnair.net

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1301 GERVAIS STREET
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Chief Clerk and Administrator
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JUN 15 2006
PSC SC
DOCKETING DEPT.
RECEIVED
6/15/06
too

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I am writing to inform the Commission that, while the execution process is in progress, it has not yet been completed. The final agreements have been prepared and distributed to the individual SCTC member companies. We expect to complete the execution process in the very near future.

SCTC and BellSouth will inform the Commission when that process is complete so that the Commission may take appropriate steps to close out this docket.

Very truly yours,

Margaret M. Fox
Margaret M. Fox

MMF/rwm

cc: Parties of Record

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
Docket No. 2005-63-C

IN RE: BellSouth Telecommunications, Inc.)
 Transit Traffic Tariff)
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**CERTIFICATE
OF SERVICE**

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Columbia, South Carolina 29202

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BellSouth Telecommunications, Inc.
675 West Peachtree Street, N. E.
Atlanta, Georgia 30375

Benjamin Mustian, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211

Bonnie D. Shealy, Esquire
Robinson McFadden
Post Office Box 944
Columbia, South Carolina 29202

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P. A.
Post Office Box 2285
Columbia, South Carolina 29202

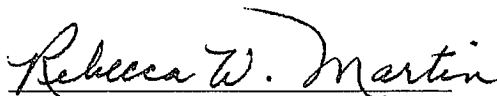
Gene V. Coker, Esquire
AT&T – Law and Governmental Affairs
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Atlanta, Georgia 30309

Robert D. Coble, Esquire
Nexsen, Pruet Adams Kleemeier, LLC
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M. Zel Gilbert
Director of External Affairs – South Carolina
Sprint
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Columbia, South Carolina 29201


Rebecca W. Martin
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

June 14, 2006

Columbia, SC

BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION

DOCKET NO. 2006-142-C

In Re:

Petition of Charter Fiberlink SC – CCO,)	
LLC for Arbitration with Piedmont)	CERTIFICATE OF SERVICE
Rural Telephone Cooperative,)	
Incorporated)	

This is to certify that I have caused to be served this day, one (1) copy of Charter Fiberlink SC – CCO, LLC’s First Set of Interrogatories and First Request for Production of Documents to Piedmont Rural Telephone Cooperative, Inc. via electronic mail and by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

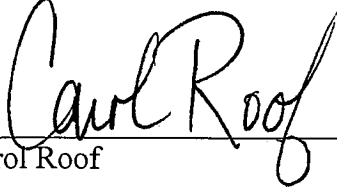
VIA HAND-DELIVERY

M. John Bowen, Esquire
Margaret Fox, Esquire
McNair Law Firm, PA
1301 Gervais Street, 11th Floor
Columbia SC 29201

The Honorable Charles L.A. Terreni
Chief Clerk
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, South Carolina 29211

Joseph Melchers, Esquire
Chief Counsel
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, South Carolina 29211

C. Lessie Hammonds, Esquire
Office of Regulatory Staff
Legal Department
PO Box 11263
Columbia SC 29211



Carol Roof

July 17, 2006
Columbia, South Carolina